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*Attorneys for Defendants R1 RCM, Inc.
and Dignity Health d/b/a St. Rose Dominican Hospital*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

HEATHER HILLBOM, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

R1 RCM INC. and DIGNITY HEALTH
d/b/a DIGNITY HEALTH – ST. ROSE
DOMINICAN HOSPITAL, ROSE DE
LIMA CAMPUS,

Defendants.

Case No.: 2:24-cv-00664-JAD-EJY

**STIPULATION AND ORDER TO STAY
PROCEEDINGS**

(FIRST REQUEST) ECF No. 25

Plaintiff Heather Hillbom (“Plaintiff”), by and through her undersigned counsel, and Defendants R1 RCM Inc. (“R1”) and Dignity Health d/b/a St. Rose Dominican Hospital (“Dignity Health” and, together with R1, “Defendants”), by and through their undersigned counsel, hereby stipulate and request that the Court stay proceedings in the above-captioned action pending the parties’ forthcoming in-person mediation, which is scheduled for January 29, 2025. In support of this stipulation, the parties state as follows:

1 On April 5, 2024, Plaintiff filed a Class Action Complaint advancing claims arising from an
2 alleged data security incident affecting Defendants. *See* ECF No. 1. Defendants filed a Joint Motion
3 to Dismiss Plaintiff's Class Action Complaint ("Motion") on August 27, 2024. ECF No. 18. The
4 Motion is fully briefed and is set for hearing on December 3, 2024 at 2:30 p.m. ECF No. 23.

5 Amid briefing on Defendants' Motion, the parties began discussing the potential for
6 mediation of the case. This matter is now scheduled to be mediated on January 29, 2025, by Bruce
7 A. Friedman (JAMS), an experienced mediator in lawsuits involving alleged data security incidents.
8 January 29, 2025 was the earliest available date that worked for Mr. Friedman, the parties, and their
9 counsel. In an effort to conserve the resources of this Court and the parties, the parties respectfully
10 request that this case, and all litigation deadlines, including but not limited to the Court's hearing of
11 Defendants' Motion and disposition thereof, be temporarily stayed until after the mediation date.

12 In connection with the temporary stay, the parties propose filing a joint status report after the
13 mediation is complete to advise the Court on whether the mediation was successful, whether
14 additional time is needed, and proposed next steps. Because cases of this complexity often are not
15 resolved in a single day of mediation, the parties propose to submit this joint status report no later
16 than February 12, 2025 (*i.e.*, 14 days from the date of mediation).

17 This request to stay proceedings is made in good faith to allow the parties to focus their
18 attention and resources on meaningful preparation for, and participation in, the scheduled mediation.
19 This is the parties' first stipulation to stay proceedings, and it is not made for any improper purpose
20 or other reason of delay.

21 IT IS THEREFORE STIPULATED, and the parties respectfully request, that the Court stay
22 all proceedings and deadlines in this case, including the hearing on and disposition of Defendants'
23 Motion, pending the parties' participation in scheduled mediation, as to which the parties will
24 provide an update to the Court in the form of a joint status report no later than February 12, 2025.

DATED this 4th day of November, 2024.

By: /s/ Mona Amini

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By: /s/ Philip R. Erwin

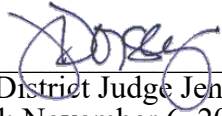
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Attorneys for Defendants

ORDER

Based on the parties' stipulation [ECF No. 25] and good cause appearing, IT IS HEREBY ORDERED that **THIS CASE IS STAYED FOR ALL PURPOSES** until February 12, 2025. Should the parties resolve this case as a result of the currently scheduled mediation and require additional time to prepare dismissal paperwork, they may file a stipulation to extend this stay.



U.S. District Judge Jennifer A. Dorsey
Dated: November 6, 2024